APPENDIX A

STATEMENT OF WORK

SLIP 4 EARLY ACTION AREA
LOWER DUWAMISH WATERWAY SUPERFUND SITE
SEATTLE, WASHINGTON

I. PURPOSE

The purpose of this Statement of Work (SOW) is to fully implement the Administrative Order on Consent (AOC).

The Work to be completed under this SOW shall include preparation and delivery of and implementation of: 1) a Draft and Final Summary of Existing Information Report and Sampling and Analysis Plan; 2) a Draft and Final Cruise and Data Report; 3) a Draft Technical Memorandum on Proposed Boundaries of the Removal Action; 4) a Draft Biological Assessment and as requested by EPA, a Draft Clean Water Act 404 Memorandum; 5) a Draft and Final Engineering Evaluation/Cost Analysis (EE/CA) for analysis of removal action alternatives and selection of a preferred alternative; 6) Prefinal and Final Project Design Documents; 7) a Draft and Final Removal Action Work Plan and implementation of the removal action; 8) a Draft and Final Removal Action Completion Report; 9) a Draft and Final Long-Term Monitoring and Reporting Plan, as appropriate, to ensure that the objectives outlined in this SOW are achieved in Slip 4; and, 10) Community Involvement Activities.

Removal activities shall be completed in accordance with Table 1 of this SOW.

II. WORK TO BE PERFORMED BY RESPONDENTS

Respondents shall complete the following tasks:

Task 1 - Summary of Existing Information Report and Sampling and Analysis Plan

Respondents shall submit a Summary of Existing Information Report and Sampling and Analysis Plan, which shall be provided as one report.

The Summary of Existing Information Report shall include, at a minimum, the following information:

- Introduction/Purpose;

- Brief description of Slip 4 Early Action Area characteristics, including ecological and physical characteristics;

- Identification of property owners of and other operators in the Slip 4 Early Action Area, and owners and operators of all immediately adjacent upland property;

- Description of the nature and extent of contamination to the extent it can be determined within the vicinity of Slip 4 including a summary of existing sediment data with a comparison to Washington State Sediment Management Standards (Sediment Quality Standards and Cleanups Screening Levels);

- Summary of existing information on all environmental investigations or cleanups on adjoining properties;

- Identification of potential historical and ongoing sources of contamination to the Slip 4 Early Action Area to the extent they can be determined;

- Other information (including maps and figures) as necessary to gain a general understanding of the Slip 4 Early Action Area.

Once this general understanding of the Slip 4 Early Action Area is achieved, Respondents shall identify data gaps that will be filled by the collection and analysis of field data. Investigation activities will focus on problem definition and result in data of adequate technical content to evaluate potential risks and support development of an analysis of alternatives in the EE/CA. Investigation activities may include waste-stream effluent monitoring to evaluate potential ongoing sources to the Slip 4 Early Action Area. In coordination with the remedial investigation team for the LDW Site, investigation activities may also include sediment sampling that generates data to support both the removal action and the Phase 2 Remedial Investigation and Risk Assessment for the LDW Site.

The procedures Respondents plan to implement for conducting all field activities will be detailed in a Sampling and Analysis Plan (SAP) to ensure that sample collection and analytical activities are conducted in accordance with technically acceptable protocols and that data meet data quality objectives. The SAP provides a mechanism for planning field activities and consists of a field sampling plan (FSP) and a quality assurance project plan (QAPP). Additional details are provided in Section III of this SOW.

The contents of the SAP shall incorporate the type of information described in EPA's Guidance for Conducting Remedial Investigation and Feasibility Studies under CERCLA (EPA/540/G-89-004) (e.g., see Appendix B of the Guidance).

Along with the SAP, Respondents shall submit a Health and Safety Plan that is designed to protect on-site personnel and area residents from physical, chemical, and all other hazards posed by field sampling efforts.

Upon request by EPA, Respondents shall also submit copies of previous studies or sampling efforts conducted independently, or under state, local or other federal authorities or agreements that are determined by EPA to relate to response selection under this Order.

Task 2 - Cruise and Data Report

Respondents shall submit a Cruise and Data Report that includes all information regarding the field sampling event, including validated analytical results.

The Cruise and Data Report shall include, at a minimum, the following sections:

- Introduction/Purpose;
- Summary of field sampling effort - at a minimum, include information on sampling vessel, dates of field effort, summary of sample collection effort (e.g., surface sediment, subsurface sediment, effluent samples), field sample observations (e.g., sediment descriptions), summary of sample and station locations – including station depths (corrected to mean lower low water), station locations (latitudes/longitudes and state plane coordinates), maps and figures. Station locations shall be provided electronically with data;
- Deviations from the Field Sampling Plan;
- Summary of sampling handling and shipment;
- Summary of all data, including a data validation report.

Respondents shall submit the data validation report for data from this field effort to EPA within 5 days of the Respondents' receipt of the data validation report from their contractor or in-house source. Information necessary for EPA to perform an independent review of the validated data shall also be provided.

Task 3 - Technical Memorandum on Proposed Boundaries of the Removal Action

Respondents shall submit a draft Technical Memorandum on Proposed Boundaries of the Removal Action. Respondents shall assemble all available data for the development of an appropriate boundary for the removal action and shall provide a rationale for the proposed boundary to EPA for review and approval. Data interpretation shall not be inconsistent with the spatial analysis approaches agreed upon by EPA for the overall LDW Site. EPA may require the preparation of additional technical memoranda to facilitate preparation of the EE/CA.

Task 4 - Engineering Evaluation/Cost Analysis (EE/CA)

Based on data obtained in previous sampling efforts, and in consideration of EPA's guidance for removal actions, Respondents will prepare a technical briefing for EPA on proposed removal alternatives that will be presented by Respondents in the EE/CA.

After the technical briefing, Respondents, in consideration of comments received from EPA at the technical briefing, will submit a first draft EE/CA. The first draft EE/CA will be revised in response to EPA comments, and a second draft EE/CA shall be submitted to EPA for release to a formal public comment period, following EPA approval, and modification if necessary if EPA comments are not adequately addressed. As requested by EPA, a final version of the EE/CA shall be submitted to EPA for review and approval in accordance with the schedule set forth in Table 1 of this SOW.

The EE/CA will contain the following sections:

- Executive Summary;
- Introduction;
- Site Characterization;
- Identification of Removal Action Objectives;
- Identification and Analysis of Removal Action Technologies;
- Identification and Analysis of Removal Action Alternatives;
- Comparative Analysis of Removal Action Alternatives;
- Recommended Removal Action Alternative;
- Schedule.

A public comment period of thirty (30) days is required for the EE/CA and any supporting documentation. Respondents shall assist EPA as requested prior to and during the comment period with its community relations activities concerning the EE/CA. After EPA has selected the removal alternative, Respondents shall perform the removal as outlined in this SOW.

Task 5 - Biological Assessment and Clean Water Act 404 Memorandum

In order to identify the presence of threatened, endangered, proposed, or candidate species, or their habitat within the vicinity of the proposed Slip 4 Early Action Area, Respondents will prepare, for EPA approval, a draft Biological Assessment (BA) to ensure compliance with the Endangered Species Act. The BA will characterize baseline conditions of the existing habitat, address potential project impacts that the removal action will have on these species, their habitat,

and their food stocks; and describe best management practices and conservation measures designed to avoid or minimize potential impacts.

If dredging, capping, or other filling is proposed by Respondents (or selected by EPA), Respondents shall submit a draft "404 memorandum" that provides sufficient information to support compliance with the substantive requirements of Section 404(b)(1) of the Clean Water Act. The memorandum shall document the information gathered regarding practicability and cost, long- and short-term impacts from all such proposed alternatives, minimization of adverse effects, and an analysis of the need for mitigation, if any.

Task 6 - Project Design Documents

Respondents shall prepare project design documents, including construction plans and specifications, to implement the removal actions in the project area as described in this SOW and shall demonstrate that the removal action shall meet all objectives of any Action Memorandum or other EPA decision document. Respondents shall meet regularly with EPA prior to and during development of design documents and provide EPA, for review and approval, the key technical documents that support the removal design (see below). Design documents, including plans and specifications, shall be submitted in accordance with the schedule set forth in Table 1 of this SOW.

Prefinal and Final Designs

Respondents shall submit the prefinal design when the design effort is 60 percent complete. Respondents shall submit for EPA approval the final design when the design effort is 100 percent complete. The Final Design shall fully address all EPA comments made on the Prefinal Design. Prefinal and Final Design shall include:

1) ***Prefinal (60%) Design Analysis Report*** shall provide the design criteria and the basis of design for the removal action. Examples of the types of information to be included are described below:

- Technical parameters and supporting calculations upon which the design will be based, including but not limited to design requirements for each active remedy (e.g., dredging, capping);

- If the selected alternative includes capping:

  - appropriate physical and chemical characteristics of materials to be used for sediment capping and method for identifying and testing clean source material, including acceptance criteria for such sediment;

  - determinations regarding potential propellor-driven erosion for capped areas;

-cap placement techniques;

- If the selected alternative includes dredging and/or excavation:

  - determinations on requirements to the contractor of how dredged or excavated sediments will be handled, stockpiled, de-watered, transported (including haul routes), and disposed of, including identification of any best management practices, monitoring, and/or analyses necessary to protect on-site personnel and area residents from chemical hazards posed by this Removal Action (such activities may be further described in the contractor's Health and Safety Plan);

  - design dredge or excavation depths and overcut allowances, dredged or excavated material volumes, and dredging or excavation techniques;

  - identification of potential upland landfill location for disposal of dredged or excavated sediments;

- Descriptions of the analyses conducted to select the design approach, including a summary and detailed justification of design assumptions and verification that design will meet performance standards;

- Access and easement requirements, and permit requirements or substantive requirements of permits;

- Analysis and recommendations on institutional controls and/or engineering controls that may need to be implemented to ensure the long-term effectiveness of the removal action, including descriptions of how such controls would be implemented, by whom, and under what circumstances such controls could be removed or terminated (see "Institutional Controls" OSWER 9355.0-74FS-P, EPA 540-F-00-005, September 2000).

If the selected alternative includes capping, the cap design shall follow appropriate EPA guidance, including "Guidance for In-situ Subaqueous Capping of Contaminated Sediments" (EPA 905-B96-004). Capping must be performed consistent with federal regulations, including requirements of Sections 404 and 401 of the CWA.

If the selected alternative includes dredging, the performance standards must be consistent with federal regulations, including requirements of Sections 404 and 401 of the CWA and Section 10 of the Rivers and Harbors Act.

2) ***Prefinal (60%) Construction Documents and Schedule***, including:

- Construction plans/drawings/sketches and required specifications;

- Proposed locations of processes/construction activity;

- Construction schedule.

3) ***Prefinal (60%) Design Plans***, including:

- Draft Construction Quality Assurance Plan (see Section III of this SOW) which shall detail the remediation verification method and approach to quality assurance during construction activities in the project area, including compliance with ARARs. The Plan will describe the methods used to measure compliance with measurement quality objectives (such as performance and method requirements), including target dredge or excavation depths, if appropriate. The Plan will include, as an attachment, a Draft Removal Action Sampling and Analysis Plan (see Section III of this SOW), which shall include a field sampling plan and a quality assurance project plan (QAPP). If the selected alternative includes capping, performance monitoring will include characterization of in-place capping materials (e.g., coverage and thickness) through such methods as video surveys, grab samples, digital photographic interpretation, or bathymetric surveys. If the selected alternative includes dredging or excavation, performance monitoring will be performed to confirm that dredged or excavated material is properly staged, dewatered, and transported to a suitable upland disposal site; and that field construction activities are properly sequenced. The Plan also will specify a quality assurance official (QAO), independent of the Respondents' Project Coordinator and independent of the project engineer/site supervisor, to conduct a quality assurance program during the construction phase of the project. The QAO is responsible for implementation and maintenance of the CQAP, and for maintaining awareness of the entire project to detect conditions that may adversely affect quality. The QAO shall, at a minimum, have knowledge, technical qualifications, and experience relating to sediment remediation projects, and shall be in daily contact with the Respondents' Project Coordinator and project engineer/site supervisor.

- Draft Water Quality Monitoring Plan and its associated Quality Assurance Project Plan and Health and Safety Plan (see Section III of this SOW), which shall detail water quality monitoring to confirm that water quality standards as defined by substantive requirements of CWA Section 401 water quality certification for compliance with the requirements in CWA Section 404(b)(1) guidelines are met (or ensure approval to allow temporary exceedances of water quality standards has been received) during any capping and dredging operations and where return-water from barges or de-watering (as appropriate) may affect the water column. The plan shall describe the specific water quality monitoring requirements, including: schedule; sampling locations; sampling intervals; sampling equipment and parameters; analytical methods; key contacts; reporting requirements (including daily reports); daily contacts for notifications of any and all exceedances; result summaries; and draft and final Water Quality Monitoring reports. A QAPP and a Health and Safety Plan specific to water quality monitoring shall be included in this deliverable.

4) ***Final Design Analysis Report and Plans***:

The 100 % Final Design submittal shall include the final Design Analysis Report; final construction documents and schedule, including final plans and specifications; final Design Plans; final cost estimate for the Removal Action and estimated cost for long-term monitoring; and a schedule for the construction and implementation of the Removal Action that identifies major milestones.

Task 7 - Removal Action Work Plan and Implementation of Removal Action

Respondents shall prepare a Removal Action Work Plan that outlines the implementation of the selected removal action alternative, including how those construction activities are to be implemented by Respondents and coordinated with EPA. The Work Plan shall include the following elements, at a minimum:

- Description of the removal action and construction activities, including project organization; construction contractor selection; site mobilization and preparatory work; dredging (if selected) including dredged or excavated material handling, bathymetric surveys, dredged or excavated material spill prevention, procedures and plans for the decontamination of equipment and the disposal of contaminated decontamination materials, stormwater pollution prevention plan; capping (if selected); performance verification; water quality monitoring; and quality assurance;

- Schedule of activities for completion of the Removal Action, including those inspections, meetings, and documents referenced in this task;

- Schedule for developing and submitting other required Removal Action plans;

- Formulation of the Removal Action team;

- Construction quality control plan and statement of qualifications (by constructor);

- Procedures for processing design changes and securing EPA review and approval of such changes to ensure changes conform to performance standards and requirements of this SOW, and are consistent with the objectives of this removal action;

- Procedures for coordinating with EPA regarding compliance with EPA's Off-Site Rule.

The Removal Action Work Plan also shall include a schedule for implementation of all Removal Action tasks identified in the Final Design Report, as approved by EPA. In addition, the Work Plan shall include a Health and Safety Plan that is designed to protect on-site personnel and area residents from physical, chemical, and all other hazards posed by this Removal Action. The safety plan shall follow EPA guidance and all OSHA requirements as outlined in 29 C.F.R. 1910 and 1926. Respondents may utilize existing Health and Safety Plan (HASP) project documents

or other company/contractor HASPs provided that Respondents demonstrates the HASP has been modified, as necessary, or otherwise sufficiently addresses the activities covered by this SOW. Draft and Final versions of the Removal Action Work Plan shall be submitted to EPA for review and approval in accordance with the schedule set forth in Table 1 of this SOW.

As described in Table 1, Respondents shall provide notification to EPA thirty (30) days prior to initiation of fieldwork to allow EPA to coordinate field oversight activities.

Respondents shall complete the sediment removal actions in accordance with the approved Final Design documents and Removal Action Work Plan. The following activities shall be completed in constructing the Removal Action.

EPA and Respondents shall participate in a preconstruction meeting to:

- Review methods for documenting and reporting data, and compliance with specifications and plans including methods for processing design changes and securing EPA review and approval of such changes as necessary;
- Review methods for distributing and storing documents and reports;
- Review work area security and safety protocols, as appropriate;
- Demonstrate that construction management is in place, and discuss any appropriate modifications of the Construction Quality Assurance Plan (CQAP) to ensure that project-specific considerations are addressed;
- Conduct a site tour in the project area to verify that the design criteria, plans, and specifications are understood and to review material and equipment storage locations, as appropriate.

Respondents shall transmit (electronically) key points and action items of the preconstruction meeting to all parties within seven (7) days of the meeting. Respondents shall submit final key points and action items of the preconstruction meeting to all parties within fourteen (14) days of the meeting.

Pursuant to the CQAP, weekly reports shall be prepared and submitted to EPA for review during the removal action. Weekly reports shall include work performed, problems encountered and solutions proposed, water quality monitoring results, and work to be performed during the following week. Respondents shall inform EPA of the disposal facility proposed to receive any debris or dredged/excavated materials from Slip 4.

Within seven (7) days after Respondents makes a preliminary determination that construction is complete, Respondents shall orally notify EPA for the purposes of scheduling a final inspection and/or meeting. Within fourteen (14) days after the final inspection and/or meeting, Respondents

shall send a letter to EPA stating that construction is complete and responding to any outstanding issues that were raised by EPA during the final inspection/meeting.

Task 8 - Removal Action Completion Report

Within 60 days after completion of the construction phase of the non-time-critical removal action, Respondents shall submit for EPA review and approval a Removal Action Completion Report. This report shall contain a description of the Work described in the Removal Action Work Plan and the Work that was actually performed. In the report, a registered professional engineer and Respondents shall state that the removal action has been constructed in accordance with the design and specifications. The report shall provide as-built drawings, signed and stamped by a professional engineer, showing the area and depth of the location remediated. The final report shall include a good faith estimate of total costs or a statement of actual costs incurred in complying with the Order, a listing of quantities and types of materials removed off-site or handled on-site, a listing of the ultimate destination(s) of those materials, a presentation of the analytical results of all sampling and analyses performed (including a map showing the locations of any confirmatory samples), and accompanying appendices containing all relevant documentation generated during the removal action (e.g., manifests, invoices, bills, contracts, and permits). All analytical data collected under this AOC shall be provided electronically to EPA in a format compatible with that used for the Remedial Investigation at the LDW Site. The final Water Quality Monitoring report may be submitted as an appendix to the Removal Action Completion Report. This report shall contain a description of any institutional controls that are in place, or engineering controls that are necessary to sustain the integrity of the removal action, along with copies of any agreements or other documents used to establish and implement such controls.

The final report shall also include the following certification signed by a person who supervised or directed the preparation of that report:

> "Under penalty of perjury under the laws of the United States, I certify that to the best of my knowledge, after appropriate inquiries of all relevant persons involved in the preparation of the report, the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

Task 9 - Long-Term Monitoring and Reporting Plan

If identified as a component of the selected alternative, Respondents shall prepare a Long-Term Monitoring and Reporting Plan for Slip 4. The Long-Term Monitoring and Reporting Plan shall include inspections and analyses to monitor the removal action implemented at Slip 4.

The Long-Term Monitoring and Reporting Plan shall describe monitoring objectives, an overview of the monitoring approach, design of the monitoring program (e.g., sampling strategy, station locations and replication, field sampling methods, laboratory methods), data analysis and

interpretation, reporting requirements, and a schedule. The Plan shall include, as appropriate, visual inspection, bathymetric survey, sediment deposition monitoring, chemical monitoring, and sediment samples in capped areas and non-capped areas (including excavated areas) to monitor for recontamination. Data from long-term monitoring shall be assembled into reports and submitted to EPA in accordance with the schedule set forth in the Long-Term Monitoring and Reporting Plan. Based on long-term monitoring results, EPA shall determine if future response actions are needed to achieve the cleanup objectives.

Task 10 - Community Involvement Activities

As requested by EPA, Respondents shall provide information supporting EPA's community involvement programs related to the Work performed pursuant to this Order, and shall participate in public meetings which may be held or sponsored by EPA to explain activities at or concerning Work performed to this Order.

Upon request by EPA, Respondents shall submit copies of plans, technical memoranda, raw data, and other reports to EPA except those documents that are privileged.

III. CONTENT OF SUPPORTING PLANS

Sampling and Analysis Plan

Respondents shall develop a project-specific Sampling and Analysis Plan (SAP), comprised of a Field Sampling Plan (FSP) and project-specific Quality Assurance Project Plan (QAPP) for sample analysis and data handling for any samples collected at the early action area. The SAP shall be based upon the AOC, SOW, and EPA guidance. As appropriate, the SAP will ensure that sample collection and analytical activities are conducted in accordance with the Puget Sound Estuary Program protocols.

The FSP will define in detail the sampling and data-gathering methods that will be used on the project. It will include sampling objectives, a detailed description of sampling activities, sample locations, sample analysis, sampling equipment and procedures, sampling schedule, station positioning, and sample handling (e.g., sample containers and labels, sample preservation).

The QAPP will describe the quality assurance and quality control protocols necessary to achieve required data quality objectives. The QAPP will be prepared in accordance with "EPA Requirements for Quality Assurance Project Plans (QA/R-5)" (EPA/240/B-01/003, March 2001) and "Guidance on Quality Assurance Project Plans (QA/G-5)" (EPA/600/R-98/018, February 1998). The QAPP will address sampling procedures, sample custody, analytical procedures, and data reduction, validation, reporting, and personnel qualifications. The laboratory performing the work must have and follow an approved Quality Assurance (QA) program, which complies with "EPA Requirements for Quality Management Plans (QA/R-2)" (EPA/240/B-01-002, March 2001) or equivalent documentation as determined by EPA. If a laboratory not in the EPA Contract Laboratory Program (CLP) is selected, the QAPP shall be consistent with the

requirements of the CLP for laboratories proposed outside the CLP. Respondents will provide assurances that EPA has access to laboratory personnel, equipment and records for sample collection, transportation, and analysis.

All sampling and analyses performed pursuant to this Order shall conform to EPA direction, approval, and guidance regarding sampling, quality assurance/quality control (QA/QC), data validation, and chain-of-custody procedures. Respondents shall ensure that the laboratory used to perform the analyses participates in a QA/QC program that complies with the appropriate EPA guidance.

Upon request by EPA, Respondents shall have such a laboratory analyze samples submitted by EPA for quality-assurance monitoring. Respondents agree that EPA personnel may audit any laboratory that performs analytical work under this AOC. Prior to awarding any work to an analytical laboratory, Respondents will inform the laboratory that an audit may be performed, and that the laboratory agrees to coordinate with EPA prior to performing analyses. Respondents shall provide to EPA the quality assurance/quality control procedures followed by all sampling teams and laboratories performing data collection and/or analysis.

Upon request by EPA, Respondents shall allow EPA or its authorized representatives to take split and/or duplicate samples. Respondents shall notify EPA not less than 14 days in advance of any sample collection activity, unless shorter notice is agreed to by EPA. EPA shall have the right to take any additional samples that EPA deems necessary. Upon request, EPA shall allow Respondents to take split or duplicate samples of any samples it takes as part of its oversight of Respondents' implementation of the Work.

All analytical data collected under this AOC shall be provided electronically to EPA.

Health and Safety Plan(s)

The Health and Safety Plan(s) ensure protection of the public health and safety during performance of on-site Work under this Order. This plan shall be prepared in accordance with EPA's Standard Operating Safety Guide (PUB 9285.1-03, PB 92-963414, June 1992). In addition, the plan shall comply with all currently applicable Occupational Safety and Health Administration ("OSHA") regulations found at 29 C.F.R. Part 1910. Respondents shall incorporate all changes to the plan recommended by EPA and shall implement the plan during the pendency of the removal action.

Construction Quality Assurance Plan

The Construction Quality Assurance Plan (CQAP) describe the project-specific components of the performance methods and quality assurance program to ensure that the completed project meets or exceeds all design criteria, plans, and specifications. The draft Plan shall be submitted with the Prefinal design and the Final Plan shall be submitted with the Final Design. The Final

Plan shall be submitted prior to the start of construction in accordance with the approved construction schedule. The Plan shall provide requirements for the following elements:

- Responsibilities and authorities of all organization and key personnel involved in the Removal Action construction, including EPA and other agencies.

- Qualifications of the Construction Quality Assurance (CQA) Officer. Establish the minimum training and experience of the CQA Officer and supporting inspection personnel.

- Inspection and verification activities. Establish the observations and tests that will be required to monitor the construction and/or installation of the components of the Removal Action. The plan shall include the scope and frequency of each type of inspection to be conducted. Inspections shall be required to verify compliance with environmental requirements and ensure compliance with all health and safety procedures.

- Performance standards and methods. Describe all performance standards and methods necessary to ensure implementation of the removal construction. Performance monitoring requirements shall be stated to demonstrate that best management practices have been implemented for dredging operations, transportation of dredged or excavated material, and proper cap placement techniques.

- Sampling activities. Establish requirements for quality assurance sampling activities, including the sampling protocols, sample size, sample locations, frequency of testing, acceptance and rejection data sheets, and plans for correcting problems as addressed in the project specifications.

- Documentation. Establish the reporting requirements for construction quality assurance activities. This shall include such items as daily and weekly summary reports, inspection data sheets, problem identification and corrective measures reports, design acceptance reports, and final documentation. A description of the provisions for final storage of all records consistent with the requirements of the AOC shall be included.

IV. SUMMARY OF MAJOR DELIVERABLES/SCHEDULE

The schedule for submission to EPA of deliverables described in the SOW is presented in Table 1.

TABLE 1 - Project Schedule

Task 1	A.1 Draft Summary of Existing Information Report/Sampling and Analysis Plan A.2 Final Summary of Existing Information Report/Sampling and Analysis Plan	A.1 Within 21 days after effective date of AOC. A.2 Within 10 days after receipt of EPA comments on draft Report/Plan.

Task 2	A.1 Draft Cruise and Data Report A.2 Final Cruise and Data Report	A.1 Within 90 days after EPA approval of the SAP. A.2 Within 14 days after receipt of EPA comments on draft Report.
Task 3	A.1 Draft Technical Memorandum on Proposed Boundaries of the Removal Action A.2 Revised Draft Technical Memorandum on Proposed Boundaries of the Removal Action	A.1 Within 14 days after submittal of the Final Cruise and Data Report to EPA. A.2 Within 5 days after receipt of EPA comments on draft Memorandum.
Task 4	A.1 Technical Briefing on Proposed Removal Alternatives A.2 First Draft EE/CA A.3 Second Draft (Public Review) EE/CA A.4 Final EE/CA	A.1 Within 80 days after submittal of the Final Cruise and Data Report to EPA. A.2 Within 14 days of the Technical Briefing on Proposed Removal Alternatives. A.3 Within 14 days after receipt of EPA comments on first draft EE/CA. A.4 Within 14 days after receipt of EPA comments on second draft EE/CA.
Task 5	A.1 Draft Biological Assessment A.2 Revised Draft Biological Assessment A.3 Draft Clean Water Act 404 Memorandum (as requested by EPA) A.4 Revised Draft Clean Water Act 404 Memorandum	A.1 Within 30 days after EPA signature of the Action Memorandum. A.2 Within 14 days after receipt of EPA comments on the draft.. A.3 Within 30 days after EPA signature of the Action Memorandum. A.4 Within 14 days after receipt of EPA comments on the draft.
Task 6	A.1 Prefinal (60 percent) Design A.2 Final (100 percent) Design	A.1 Within 60 days of EPA signature of the Action Memorandum. A.2 Within 30 days after receipt of EPA comments on Prefinal Design.

TABLE 1 - Project Schedule (continued)

Task 7	A.1 Draft Removal Action Work Plan A.2 Final Removal Action Work Plan A.3 Notification of Removal Action Start A.4 Removal Action Start	A.1 Within 60 days after EPA approval of the Final Design. A.2 Within 14 days after receipt of EPA comments on draft Removal Action Work Plan. A.3 Provide notification to EPA 30 days prior to initiation of removal action fieldwork to allow EPA to coordinate field oversight activities. A.4 Within 30 days after approval of Removal Action Work Plan, consistent with environmental windows for in-water work.

Task 8	A.1 Draft Removal Action Completion Report A.2 Final Removal Action Completion Report	A.1 Within 60 days after completion of removal action (construction phase). A.2 Within 30 days after receipt of EPA comments on Draft Removal Action Completion Report.
Task 9	A.1 Long-Term Monitoring and Reporting Plan, as requested by EPA A.2 Monitoring Data Reports	A.1 Within 60 days after EPA approval of the Final Removal Action Completion Report, as requested by EPA. A.2 Schedule to be proposed by Respondents in the Long-Term Monitoring and Reporting Plan.